



November 3, 2003

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: *Ex Parte* Notice
Telephone Number Portability, CC Docket No. 95-116

Dear Ms. Dortch:

On November 3, 2003, the attached letter was sent via
facsimile to each of the FCC's Commissioners.

Consistent with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we
are filing one electronic copy of this notice in the above-captioned proceeding and
request that you place it in the appropriate record. Please direct any questions concerning
the above matter to the undersigned at (703)351-2020.

Sincerely,

/s/ Jill Canfield
Jill Canfield
Regulatory Counsel
Legal and Industry



November 3, 2003

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW Room 8 B201
Washington, DC 20554

The Honorable Kathleen Q. Abernathy
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Jonathan Adelstein
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Michael Copps
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 2054

The Honorable Kevin Martin
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Telephone Number Portability, CC Docket No. 95-116

Dear Commissioners:

It is our understanding that the Commission is currently considering issuing a declaratory ruling in response to a request by the Cellular Telecommunications and Internet

Association (CTIA) that the Commission address inter-modal local number portability. CTIA advocated that the Commission require that wireline carriers port numbers outside the wireline rate center to the larger wireless calling areas. While NTCA agrees that certainty on the porting issues is essential, CTIA's position is detrimental to the future of the small ILECs serving rural America.

While NTCA has never opposed wireless porting, we have met with each of you or your advisors explaining the problems and unanticipated consequences of CTIA's proposed porting scenario. The Commission has previously determined that wireline LNP is bound by the existing rate center of the ILEC based on the NANC finding that "location portability is technically limited to rate center/rate district boundaries of the incumbent LEC due to rating and routing concerns." As was further explained in comments and in meetings, requiring number porting outside of the ILEC rate centers will impact rate structures and affect the entire intercarrier compensation scheme. It is NTCA's position that the number portability proceeding should not be an accidental shortcut around critical issues currently before the Commission.

The Commission should take care to ensure that the implementation of wireless number portability does no harm to small and rural carriers. The record is currently insufficient for the Commission to reach such a conclusion. The rules limiting LNP to the existing rate center of the ILEC should remain in place unless or until the Commission conducts a rulemaking and develops a full record to study the impact of any changes.

Sincerely,

/s/ Michael E Brunner
Michael E. Brunner
Chief Executive Officer

MEB:jc